

Attorney Docket No.: 01CON288PC

REMARKS

By the present amendment and response, claim 91 has been amended to overcome the Examiner's objections. Claims 91-119 remain in the present application and claims 111-119 have been allowed. Reconsideration and allowance of outstanding claims 91-110 in view of the following remarks are requested.

The Examiner has rejected claims 91-110 under 35 USC §112, first paragraph. Applicant has amended claim 91 in response to the Examiner's objection and submits that the requirements of 35 USC §112, first paragraph, have been met.

The Examiner has rejected claims 91, 95-96, 98-105, and 107-110 under 35 USC §102(b) as being anticipated by U.S. patent number 4,792,773 to Bert et al. ("Bert"). For the reasons discussed below, Applicant respectfully submits that the present invention, as defined by amended independent claim 91, is patentably distinguishable over Bert.

The present invention, as defined by independent claim 91, includes, among other things, first and second ground planes integral to a single interconnect substrate and operatively associated with respective first and second active chips and respective first and second discrete components mounted on and situated on the single interconnect substrate, "wherein said first ground plane is separated from said second ground plane." As disclosed in the present application, the present invention can provide two separate ground planes that are formed on the same or different metal layers of a single interconnect substrate, where the first ground plane is operatively associated with a first active circuit chip and the second ground plane is operatively associated with a second

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active circuit chip, and where the first and second active circuit chips are situated on the single interconnect substrate.

By providing two separate ground planes associated with respective first and second active circuit chips situated on the single interconnect substrate, the present invention advantageously obtains a reduction in the amount of unwanted RF interference between first and second functionally distinct portions of a multiple chip module, where the first and second functionally distinct portions are associated with the respective first and second active circuit chips. Additionally, the present invention provides a multiple chip module that can include a number of discrete components, such as resistors, capacitors, and inductors, which can be advantageously surface mounted or printed on the surface of the single interconnect substrate.

In contrast to the present invention as defined by amended independent claim 91, Bert does not teach, disclose, or suggest first and second ground planes integral to a single interconnect substrate and operatively associated with respective first and second active chips and respective first and second discrete components mounted on and situated on the single interconnect substrate, "wherein said first ground plane is separated from said second ground plane." Bert specifically discloses an ultra high frequency circuit including active components 2 and 3, which are attached to a first main face of substrate 1 by respective metallizations 4 and 5. See, for example, column 2, lines 47-53 and Figure 1 of Bert. In Bert, ground plane 9 is situated on the second main face of substrate 1 and

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can be coupled to metallizations 4 and 5 by respective first and second parasite capacities C1 and C2. See, for example, column 3, lines 13-21 and Figure 2 of Bert.

Thus, in Bert, active components 2 and 3 are coupled to the same ground plane, i.e. ground plane 9. Consequently, in Bert, active components 2 and 3 are not operatively associated with respective first and second ground planes, where the first and second ground planes are separated ground planes, as specified in amended independent claim 91. Furthermore, Bert fails to teach, disclose, or suggest first and second ground planes integral to a single interconnect substrate and operatively associated with respective first and second active chips, where the first ground plane is separated from the second ground plane.

Bert further discloses a discrete component, i.e. capacity C', which is formed by block 11 and metallizations 8 and 12 and is situated on the first main surface of substrate 1. See, for example, column 4, lines 26-28 and Figure 5 of Bert. However, Bert fails to teach, disclose, or suggest a second discrete component situated on the single interconnect substrate as specified by amended independent claim 91.

For the foregoing reasons, Applicant respectfully submits that the present invention, as defined by amended independent claim 91, is not suggested, disclosed, or taught by Bert. As such, the present invention, as defined by amended independent claim 91, is patentably distinguishable over Bert. Thus claims 95-96, 98-105, and 107-110 depending from independent claim 91 are, *a fortiori*, also patentably distinguishable over

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Bert for at least the reasons presented above and also for additional limitations contained in each dependent claim.

The Examiner has further rejected claims 92-94 under 35 USC §103(a) as being unpatentable over Bert in view of U.S. patent number 5,652,466 to Hirakawa et al. As discussed above, amended independent claim 91 is patentably distinguishable over Bert and, as such, claims 92-94 depending from amended independent claim 91 are, *a fortiori*, also patentably distinguishable over Bert for at least the reasons presented above and also for additional limitations contained in each dependent claim.

The Examiner has further rejected claim 97 under 35 USC §103(a) as being unpatentable over Bert in view of U.S. patent number 5,818,699 to Yoshitaka Fukuoka. As discussed above, amended independent claim 91 is patentably distinguishable over Bert and, as such, claim 97 depending from amended independent claim 91 are, *a fortiori*, also patentably distinguishable over Bert for at least the reasons presented above and also for additional limitations contained in the dependent claim.

The Examiner has further rejected claim 106 under 35 USC §103(a) as being unpatentable over Bert. As discussed above, amended independent claim 91 is patentably distinguishable over Bert and, as such, claim 106 depending from amended independent claim 91 are, *a fortiori*, also patentably distinguishable over Bert for at least the reasons presented above and also for additional limitations contained in the dependent claim.

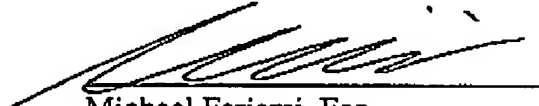
Based on the foregoing reasons, the present invention, as defined by amended independent claim 91 and claims depending therefrom, is patentably distinguishable over

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the art cited by the Examiner. Thus, claims 91-110 are patentably distinguishable over the art cited by the Examiner. For all the foregoing reasons, an early allowance of outstanding claims 91-110 and an early Notice of Allowance for all claims 91-119 remaining in the present application is respectfully requested.

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Respectfully Submitted,
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